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BUILDING GLOBAL COMMUNICATIONS

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September 27, 2000

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Ms. Magalie Roman Salas
Secretary, Federal Communications Commission
Room TW-A325
445 12th Street SW
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Ex Parte, In the Matter of Notice of Proposed Rulemaking (NPRM) in Docket No. CC 99-216, In the Matter of Biennial Regulatory Review of Part 68 of the Commission's Rules and Regulations (47 C.F.R. Part 68)

Dear Ms. Salas:

This is to confirm that on September 26, 2000, the Telecommunications Industry Association ("TIA") User Premises Equipment Division participated in a meeting with Staci L. Pies, Deputy Division Chief, Network Services Division (NSD), Common Carrier Bureau (CCB); Art Wall, Engineering Advisor, Policy and Rules Division, Office of Engineering and Technology; Susan Magnotti, Senior Attorney, CCB; William Howden, Commission staff engineer, CCB; and Dennis Johnson, Attorney Advisor, NSD, CCB; to discuss Notice of Proposed Rulemaking (NPRM) in Docket No. CC 99-216, In the Matter of Biennial Regulatory Review of Part 68 of the Commission's Rules and Regulations (47 C.F.R. Part 68).

Participating in the meeting, in addition to Staci L. Pies, Art Wall, Susan Magnotti, William Howden, and Dennis Johnson were Pierre Adornato, Nortel Networks; Steve Whitesell, Advanced American Telephones; Greg Slingerland, Mitel; and Dan Bart and Roberta Breden, TIA staff.

The meeting discussion addressed the status of the proposed NPRM on the deregulation/privatization of equipment registration and telephone network connection rules (47 C.F.R. Part 68) within the Commission, and any questions the Commission might still have regarding this issue. Also discussed were updates on Declaration of Conformity option and additional information on equipment approval database and customer premises equipment labeling.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Roberta E. Breden".

Roberta E. Breden
Director, Technical and Regulatory Affairs

No. of Copies rec'd 013
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TIA'S CAPABILITIES TO BE GATEKEEPER/SECRETARIAT

- *Ex Parte* Presentation on CC Docket No. 99-216 by the Telecommunications Industry Association, Tuesday, September 26, 2000

TIA DOMESTIC REGULATORY ACTIVITIES

Longstanding TIA (and prior to 1988 EIA/ITG)
involvement in regulatory issues in support of
Commission on:

- FCC PBX Advisory Committee, Docket 19528
(Inauguration of Part 68), and all Part 68-related
dockets since.

TIA DOMESTIC REGULATORY ACTIVITIES

Other FCC regulatory involvement:

- CALEA
- Part 15
- Part 22
- HAC NRC
- Section 255 TAAC
- NRC II
- NRIC III Focus Group 2
- NRIC IV
- NANC
- NCC Public Safety

TIA INTERNATIONAL STANDARDIZATION/ INDUSTRY PARTICIPATION

- Secretariat to:
 - NAFTA Consultative Committee on Telecommunications (“CCT”), USA Secretariat
 - 3rd Generation Partnership Project 2, Participant and Secretariat (“3GPP2”)
 - Interim Secretariat to International Forum on ANSI-41 Standards Technology (“IFAST”)
 - US ITU Association Secretariat
- Participation in GSC/RAST
- Public Safety Partnership Project (“PSPP”)
- ITU, IEC, ISO, JTC-1, CITELE

TIA'S INTERNAL RESOURCES
To Support Domestic Standards Groups and
Secretariats

- List Servers
- Web Sites and FTP Sites
- Wired/Wireless LANS
- E-mail Capabilities
- Professional Meeting Planning for meetings from 2 To 70k
- Seminar Activities
- Industry Area Experts
- Sized to task at hand

TIA Willing to be Gatekeeper or Secretariat

- Given long-standing TIA involvement in Part 68: Regulatory, Assistance to FCC:
 - TR-41.9, TR-41.2, TR-41.11
 - FCC/Industry meeting support
 - Biennial Part 68 Seminar
 - Testing issues
 - TAPAC liaison
- ANSI SDO, open and transparent processes
- Recognized for support by NCC on Public Safety
- Would either be Secretariat for CTA or host CTA Forum, open to same interest groups

Part 68 will still need FCC oversight and regulatory compulsion and enforcement

NEW Part 68 Rule:

- The GATEKEEPER shall provide ongoing oversight of Part 68, including databases, technical rules, and testing issues, subject to Commission review.
- Parties shall attempt to resolve issues regarding Part 68 and its administration among themselves and, if necessary, under the auspices of the GATEKEEPER.
- If any party objects to the GATEKEEPER's proposed resolution, the GATEKEEPER shall issue a written report summarizing the positions of the parties and the basis for the recommendation adopted by the GATEKEEPER.
- The GATEKEEPER Chair shall submit its proposed resolution of the disputed issue to the Chief of the Common Carrier Bureau as a recommendation for Commission review.

Part 68 will still need FCC oversight and regulatory compulsion and enforcement

- The Chief of the Common Carrier Bureau will place the GATEKEEPER's proposed resolution on public notice.
- Recommendations adopted by the GATEKEEPER and forwarded to the Bureau may be implemented by the parties pending review of the recommendation.
- Within 60 days of the conclusion of the comment cycle, the Chief of the Common Carrier Bureau may issue an order adopting, modifying or rejecting the recommendation.
- If the Chief does not act within 60 days of the conclusion of the comment cycle, the recommendation will be deemed to have been adopted by the Bureau.

See, CC Docket No. 95-116, RM 8535, SECOND REPORT AND ORDER for precedence.

TIA Proposal on Database & Labeling of CPE

Central Database

- Required regardless of Approval Method
- Task of maintenance and upgrades should belong to the gatekeeper
- Initial implementation to be transfer of FCC database to gatekeeper
- Gatekeeper should decide how to evolve and improve it (e.g. Web access)

CPE Labeling

- Required regardless of Approval Method
- Propose new numbering scheme and reduce other labeling requirements
- In alignment with OET numbering scheme
- Permits common number for CCB and OET

Update on Supplier's Declaration of Conformity

Past Activities

- TIA Supplemental Comments filed July 1999 recommended DoC option
- Rationale still valid
- Speed to market for new technology

Moving Forward

- Difference between FCC and ISO/IEC definitions of declaration
- Implementation of European RTTE Directive - as of April 2000
- World wide movement to harmonize equipment approval process

Telecommunications Industry Association User Premises Equipment Division

Proposal On

Database and labeling of CPE compliant with 47 CFR Part 68

Sept 26, 2000

INTRODUCTION

In the FCC's 2000 Biennial Regulatory Review of Part 68 of the Commission's Rules and Regulations, CC Docket No. 99-216, the Commission proposed to combine the registration marks and equipment numbering systems for Part 15 and Part 68 equipment, discussed central database issues, and requested input on exact labeling format. In the Telecommunication Industry Association's ("TIA") comments on this NPRM, we indicated that TIA User Premises Equipment Division ("UPED") Committee TR41, Subcommittee TR41.11 was, "...working on this issue and that it will be producing an industry proposal that includes input from manufacturers, service providers, testing laboratories, and TCB's." This document represents the outcome of that work.

OVERVIEW

After much consideration by a diversity of interested parties, TIA UPED recommends:

- the existing FCC Part 68 database¹ be transferred to and maintained by the designated gatekeeper organization;
- this same database be used for all future terminal equipment, until such time as a new enhanced database can be created;
- in order to reduce the labeling requirements we propose that a new terminal equipment identification format be adopted;
- all terminal equipment have a label that bears this unique identification.

¹ In this document when we discuss the "database" we mean the computerized database that the FCC currently maintains. Those paper items required as part of the Form 730 application submission (primarily technical data and test results) should continue to be the responsibility of the FCC (or the TCB) who receives the submission package. In the event that Declaration of Conformity or Verification is adopted, this data should be maintained by the manufacturer and made available to the FCC upon request.

I. CENTRALIZED DATABASE

It is clear that the FCC no longer intends to keep the database, data entry, and maintenance functions for equipment certified under 47 CFR Part 68. TIA UPED believes, however, that a centralized database is still essential for the following reasons, regardless of the approval process chosen by the FCC:

1. In the event that Customer Premises Equipment (CPE) caused harm to the Public Switched Telephone Network (PSTN), information required to initiate and control corrective action would be readily available.
2. A central database provides quick access to information needed by service providers to troubleshoot network harms issues.
3. A central database greatly simplifies product labeling. Except for information needed by consumers, the product label only has to provide a link back to the database.

TIA UPED proposes that initially the existing FCC database be turned over to the selected gatekeeper who would have the responsibility to update and maintain it without initially making any enhancements to it. UPED recommends that work should continue on the formulation of a new and improved database that contains a minimal but necessary set of product information.

Some information in the existing database maintained by the FCC under Part 68 is rarely accessed after the responsible party submits it. Since reducing the database results in a reduction of cost and time in building and maintaining it, TR41.11 is working with its members (which includes carriers, labs, and manufacturers) to determine which of the existing fields of the database would need to stay, which could be removed, and which may have to be added. This work is in progress and will be socialized with all interested parties when complete.

II. LABELING

TIA UPED believes that it is necessary to maintain an identification number on products approved to Part 68 regardless of the approval level (Certification, Verification, or Declaration of Conformity) adopted by the FCC. This number would be the key identifier in case of a recall, and would serve as a pointer back to a central database that contains additional information about the product. We believe that the existing numbering scheme (refer to Appendix C) can be simplified (refer to Appendix D). Appendix A proposes a scheme that provides the minimum necessary amount of information in the product approval number. It also permits other labeling requirements to be relaxed (refer to Appendix D).

We also believe that it would be advantageous to combine the Part 68 and Part 15 numbering schemes. With the reduction in product size and the proliferation of marks required on products to satisfy various market requirements world wide any possibility to reduce the quantity of marks

required should be seriously considered. Appendix B provides a proposal for a numbering scheme that would permit the current Part 15 and Part 68 numbering requirements to be combined. Since the OET and the CCB currently issue grantee codes independently, it is possible that the OET Grantee code ("XXX" in Appendix B) and the CCB Grantee code ("AAA" in Appendix A) could be the same for two different applicants. If the FCC can coordinate the OET and CCB grantee codes, TIA UPED recommends adopting the combined approval number format.

Note that implementing the proposed Part 68 product number scheme does not require that the CCB and OET databases be combined. Our goal is a reduction in the product labeling requirements therefore this proposed numbering scheme provides that benefit and leaves open the option to combine the CCB and OET numbering or databases or both should that become achievable.

III. CONCLUSIONS

TIA UPED has reviewed, through the work of the TIA TR41.11 sub-committee, the questions and concerns relating to database and equipment labeling which the Commission has outlined in its recent NPRM under Docket 99-216. In addition to its previously filed comments and reply comments, TIA UPED proposes the following conclusions that have been agreed to by all participating stakeholders and interested parties.

1. Some form of central database for terminal equipment approvals will be needed on an ongoing basis, regardless of approval method.
2. Task the selected gatekeeper with the responsibility of continuing the upkeep of the existing database of approved terminal equipment.
3. Industry, under the direction of the selected gatekeeper, will formulate plans on how to develop a new equipment approval database to take advantage of the Web tools and Web access that is now commonplace.
4. We propose a new numbering scheme to be used for all future terminal equipment approvals, regardless of approval method.

APPENDIX A - Proposed labeling/numbering scheme.

With the exception of the letters “HAC” all the labeling information currently required for registration can be encoded into the registration number itself. The TIA UPED recommended format for this number is as follows:

Format: **FCC68: AAAEQYY123**

Where:

FCC68: Is a “fixed field” in the number that would serve to indicate that the CPE meets requirements of 47 CFR Part 68. The colon is an intentional separator between this fixed field and the number to eliminate confusion between these two parts.

AAA Is the existing CCB Grantee Code.

EQ Is an Equipment Code that would indicate to the Service Provider any special signal handling or billing requirements. Note that this could be different from the existing equipment codes listed in the Part 68 Application Guide. Any proposed changes will be addressed by TIA TR 41.11 in future revisions of the Part 68 Application Guide.

YY Is the REN without a decimal point (E.g. REN of 1.0 = 10, REN of 0.3 = 03). In the case of a “Z” ringer, ZZ would appear. In the case of registered components without a network interface “NA” would appear.

123 Is a product identifier, unique when combined with the responsible party’s Grantee Code, of at least one and up to 10 characters (including one or more dashes (-) if desired) similar to the product identifier used by the FCC OET in its FCC ID. This unique product identifier would be defined by the responsible party, not the FCC/TCB, and checked by the FCC/TCB for uniqueness within the applicant’s Grantee Code.

A sample label incorporating all the recommended information for Part 68 is shown below.

**FCC68: AAAEQYY123
HAC**

APPENDIX B - Combining Part 15 and Part 68 numbers.

TIA UPED believes that the OET's EMI and RF certification-numbering plan and the CCB's Part 68 certification number plan, could be combined using the certification-numbering proposal in Appendix A and the method described below:

The equipment numbering system used by the FCC's OET for Part 15 certification is given in 47 CFR 2.925 and 2.926 as follows:

Format: **FCC ID: XXX123**

Where:

XXX Is the existing OET Grantee Code.

123 Is the Equipment Code.

(The Equipment Code is a series of Arabic numerals, capital letters or a combination thereof that may include the dash or hyphen (-). The total of Arabic numerals, capital letters and dashes or hyphens shall not exceed 14)

The proposed Part 68 certification number is similar to the FCC ID defined in Part 2. If the 2-digit Equipment Code, 2-digit REN, and (up to) 10-digit product identifier are combined they can be considered an (up to) 14-digit Equipment Product Code, so that the following is possible:

Certification Code for Part 68 certified equipment: **FCC68: AAAEQYY123**

Certification Code for OET RF certified equipment: **FCC ID: XXX123**

Certification code for product with both certifications: **FCC68ID: AAAEQYY123**

Or: **FCC68ID: XXxEQYY123**

TIA UPED believes that the letters "ID" in the combined certification codes above is somewhat ambiguous and that using the letters "RF" would be less confusing.

NOTE: this proposal does not affect products that do not currently require an approval number on the label.

APPENDIX C - Existing Part 68 labeling requirements.

To better understand TIA UPED's position on labeling of CPE, the existing labeling requirements given in 47 CFR Part 68 and the Part 68 Application Guide are shown in Table 1.

Table 1: Existing 47CFR 68 Label requirements

1	The statement "Complies With Part 68, FCC Rules" (Ref 47 CFR 68.300 (a))
2	<p>FCC Registration Number (Ref 47 CFR 68.300 (a))</p> <p>Format: AAACCC-XXXXX-EQ-S</p> <p>AAA = Grantee Code</p> <p>CCC = Country Code</p> <p>XXXXX = Number Assigned by the FCC</p> <p>EQ = Equipment Code</p> <p>S = Signaling Code</p>
3	Ringer Equivalence Number (Ref 47 CFR 68.300 (a))
4	Grantee's Name (Ref 47 CFR 68.300 (b))
5	Model Number (Ref 47 CFR 68.300 (b))
6	Serial Number or Date of Manufacture (Ref 47 CFR 68.300 (b))
7	Country of Origin (Ref 47 CFR 68.300 (b))
8	The type of phone jack used on the product (Ref. Part 68 Application Guide)
9	<p>For telephones that meet the hearing aid compatibility requirements of §68.316 : (Ref 47 CFR 68.300 (c))</p> <p>The letters "HAC"</p> <p>(Note: For phones that do not meet § 68.316, there are marking requirements given in 47 CFR § 68.224 and 68.218.)</p>
10	<p>For Registered Components: (Ref. Part 68 Application Guide)</p> <p>A. The statement:</p> <p>"Component Registration Only (refer to instruction manual)"</p> <p>B. For components without a network interface:</p> <p>'N/A' on the label where the ringer equivalence would be stated.</p>

APPENDIX D – Labeling Simplification

TIA UPED believes that labeling can be simplified as follows:

- A. The statement “Complies With Part 68, FCC Rules” can be simplified to “FCC68”. This still permits easy field determination that a product is compliant with Part 68 but minimizes the labeling required to do that. Further expansion of this idea is provided in Appendix B to include the OET requirements.
- B. Some of the information that is currently required by 47 CFR 68.300 is not needed on the product’s label. The information may be useful, but needn’t be on the product itself as long as it is included in a central database. The items that can be removed from Part 68 as a labeling requirement.:
 - i) The Plug / Jack designation
 - ii) The Signaling Code in the Registration Number.
- C. The Grantee’s name, required by 47 CFR 68.300, is already encoded in the Registration Number and need not be repeated on the product label. Therefore the Grantee’s name can be removed from Part 68 as a labeling requirement.
- D. The Model Number, although almost universally used on all products, should not be required on the label by Part 68 as a condition of attaining market access. It may help a responsible party in limiting a recall, but the actual recall would be based on the registration number, not the model number. Therefore the model number can be removed from Part 68 as a labeling requirement.
- E. The same logic applies to the “Serial Number or Date Code”. Although it can potentially be used to limit quantities in a recall and is almost universally used, it should not be required on the label as a condition of attaining market access. Therefore the serial number and date code can be removed from Part 68 as a labeling requirement.
- F. The country of origin requirement in 47 CFR 68.300 is a reminder that the product must be marked with the country of origin per Title 19, not an additional requirement beyond Title 19. Therefore the country of origin can be removed from Part 68 as a labeling requirement.
- G. The letters “HAC” used to indicate compliance with 68.316 are intended for use by HAC compatible hearing aid users and should be readable on the product. Therefore it should be retained as required marking on product compliant with 68.316. Additionally, products that do not meet HAC requirements should continue to be marked (on the retail carton and in the instruction book) per existing FCC rules 68.224 and 68.218.